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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JANE DOE, an Individual,

Plaintiff,

VS.

CITY OF LAS VEGAS, CITY OF HENDERSON, NATHAN HANNIG, an Individual, MARIO RUEDA, an Individual, RUBEN SANCHEZ, an Individual, JAMES SUAREZ, an Individual, JONATHAN CUFF, an Individual, JOSEPH "JOE" VANEK, an Individual, JAROD BARTO, an Individual, CODY RACINE, an Individual, JASON TULLIS, an Individual, and ZACH YEOMAN, an Individual, WILLIAM McDONALD, an Individual, and as an Individual, JON STEVENSON, an Individual, JOHN DOE #1, likely an Individual, DOES I-X; ROE CORPORATIONS I-X,

Defendant.

CASE NO. 2:19-cv-0382-GMN-PAL

STIPULATION AND ORDER FOR EXTENSION OF TIME
(FIRST REQUEST)

Plaintiff's Complaint sets forth causes of action against multiple defendants, including but not limited to, the City of Las Vegas (hereinafter referred to as "City") and current and former City employees. Pursuant to Local Rules 6-1, 6-2, and 7-1, Plaintiff JANE DOE, Defendant CITY OF LAS VEGAS, hereby stipulate and respectfully request that the Court extend the time for the City of Las Vegas to Answer or otherwise respond to Plaintiff's

1 Complaint and to oppose or otherwise respond to Plaintiff's Motion for Leave to Proceed
2 Anonymously as follows: by forty-five (45) days from **March 25, 2019** to **May 9, 2019** for
3 Defendant to respond to Plaintiff's Motion to Leave to Proceed Anonymously ("Motion") [Dkt.
4 No. 8]; and forty-five (45) days from **March 28, 2019** to **May 13, 2019** for Defendant to respond
5 to Plaintiff's Complaint and Jury Demand ("Complaint") [Dkt. No. 1].

6 Upon information and belief none of the individual defendants have been served, and at
7 this juncture the City has not determined which, if any, of the named City employees will be
8 provided a defense or legal counsel. Accordingly, while the City does not represent any of the
9 employees at this juncture, the intent of this stipulation would be to apply the same extension to
10 those individuals. This first extension request is not being sought to unduly delay the
11 proceedings; rather, for the good cause discussed above. In addition, Defendant requires
12 additional time to conduct their internal investigation so that they may properly respond to the
13 allegations in Plaintiff's Complaint. An additional forty-five (45) days for Defendants to file
14 their responsive pleading and response to the Motion will not alter the date of any event or any
15 deadline already fixed by Court order.

16 DATED this 27th day of March, 2019.

17 HKM EMPLOYMENT ATTORNEYS LLP

18 By: /s/ Jenny Foley

19 JENNY L. FOLEY, PH.D., ESQ.
20 Nevada Bar No. 9017
21 1785 E. Sahara Avenue, #300
22 Las Vegas, NV 89104
23 Attorneys for Plaintiff

16 DATED this 27th day of March, 2019.

17 BRADFORD R. JERBIC
18 City Attorney

19 By: /s/ Jack Eslinger

20 JACK O. ESLINGER
21 Deputy City Attorney
22 Nevada Bar No. 8443
23 495 South Main Street, Sixth Floor
24 Las Vegas, NV 89101
25 Attorneys for CITY OF LAS VEGAS

26 IT IS SO ORDERED.

27 
28 UNITED STATES MAGISTRATE JUDGE

29 April 10, 2019

30 DATE